

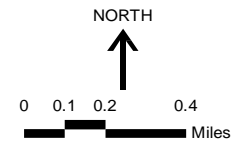
LEGEND

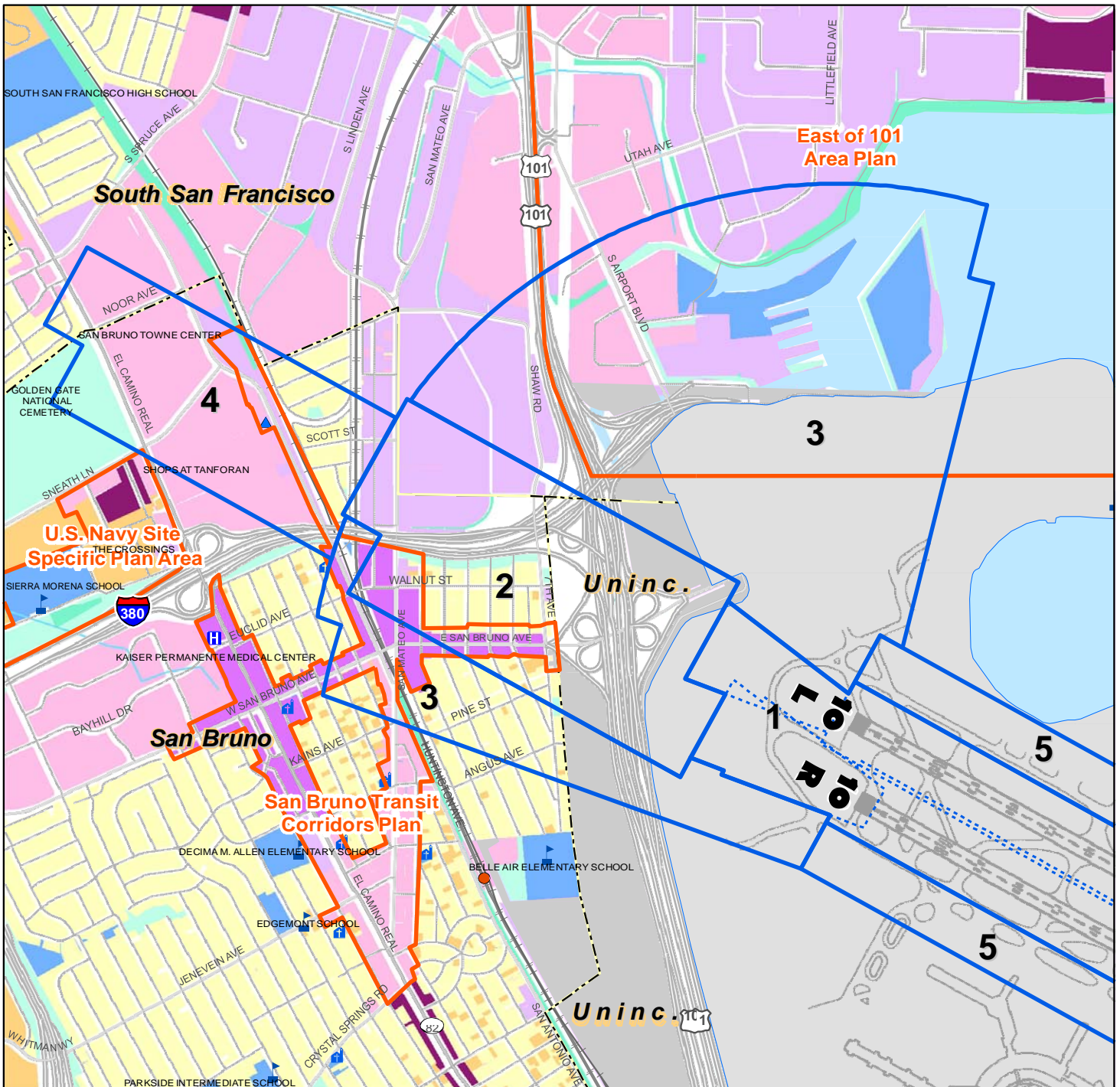
- CNEL Contour, 2020 Forecast
- Airport Property
- ▲ BART Station
- CALTRAIN Station
- ▤ School
- Ⓜ Place of Worship
- Ⓜ Hospital
- Municipal Boundary
- Railroad
- Freeway
- Road

Planned Land Use Per General Plans:

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space
- Planned use not mapped

- Sources:**
- Noise Contour Data:
 - Draft Environmental Assessment, Proposed Runway Safety Area Program, San Francisco International Airport. URS Corporation and BridgeNet International, June 2011
- County Base Maps:
 - San Mateo County Planning & Building Department, 2007
- Local Plans:
 - Burlingame Bayfront Specific Area Plan, August 2006
 - Burlingame Downtown Specific Plan, January 2009
 - Burlingame General Map, September 1984
 - North Burlingame/ Rollins Road Specific Plan, February 2007
 - Colma Municipal Code Zoning Maps, December 2003
 - Daly City General Plan Land Use Map, 1987
 - Hillsborough General Plan, March 2005
 - Millbrae Land Use Plan, November 1998
 - Pacifica General Plan, August 1996
 - San Bruno General Plan, December 2008
 - San Mateo City Land Use Plan, March 2007
 - San Mateo County Zoning Map, 1992
 - South San Francisco General Plan, 1998





LEGEND

Safety Compatibility Zones

- 1 - Runway Protection Zone-Object Free Area
- 2 - Inner Approach/Departure Zone
- 3 - Inner Turning Zone
- 4 - Outer Approach/Departure Zone
- 5 - Sideline Zones
- Internal boundaries of ALP-defined areas
- Specific Plan Area
- Airport Property
- ▲ BART Station
- CALTRAIN Station
- ✎ School
- ✎ Place of Worship
- H Hospital
- Municipal Boundary
- Railroad
- Freeway
- Major Road
- Road

Planned Land Use Per General Plans

- Public
- Multi-Family Residential
- Single Family Residential
- Mixed Use
- Transit Oriented Development
- Commercial
- Industrial, Transportation, and Utilities
- Local Park, Golf Course, Cemetery
- Regional Park or Recreation Area
- Open Space

Sources:

- Local Plans:**
- San Bruno General Plan, December 2008
 - South San Francisco General Plan, 1998

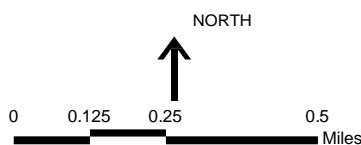


Exhibit IV-8
**SAFETY COMPATIBILITY ZONES
 IN THE CITIES OF SOUTH SAN FRANCISCO
 AND SAN BRUNO**
 Comprehensive Airport Land Use Plan
 for the Environs of San Francisco International Airport
CICAG
 City/County Association of Governments
 of San Mateo County, California



San Francisco International Airport

August 9, 2022

Billy Gross, Principal Planner
 City of South San Francisco
 Planning Division
 315 Maple Ave.
 South San Francisco, CA 94080

TRANSMITTED VIA E-MAIL and U.S. MAIL
billy.gross@ssf.net

Subject: Comment Letter: Draft Program Environmental Impact Report for Proposed South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan

Thank you for notifying San Francisco International Airport (SFO or the Airport) regarding the preparation of a Draft Program Environmental Impact Report (Program EIR) for the proposed South San Francisco General Plan Update, Zoning Code Amendments, and Climate Action Plan (the Proposed Project). We appreciate this opportunity to coordinate with the City of South San Francisco (the City) in considering potential land use compatibility issues that the Proposed Project may pose and should address.

As described in the Draft Program EIR, the project site is the geographic limits of the City, in San Mateo County. The southeastern portion of the project borders, and in certain areas overlaps with, City and County of San Francisco/SFO property boundaries. The City is primarily residential, with this use occupying approximately 40% of its land area, followed by industrial/research and development at approximately 30%, and parks/open space/common greens at approximately 10%. The Proposed Project would serve as a blueprint for the City's vision through the year 2040 and would replace the 1999 General Plan and inform updates to the City's Zoning Ordinance.

The Airport's specific comments regarding Draft Program EIR are noted below:

1. NOISE COMPATIBILITY

The Airport is concerned that much of the land slated for zoning changes is closer to the Airport than the previous General Plan's housing element, and portions of the proposed mixed-use residential zones are within the Airport's runway safety zone boundaries and 65 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour. We expressed concern about this issue in our March 22, 2021 comment letter, which is attached hereto as Exhibit A (and incorporated by reference.). In the 1999 General Plan, the City acknowledged the significance of and retained areas east of U.S. 101 for cargo handling and freight forwarder uses that support the cargo operations of companies using SFO. The Airport appreciates that in the intervening years, the City has successfully maintained these land uses east of U.S. 101, which enhance and support the relationship among the City, its residents, and the Airport, and supports the City and regional economy. These existing compatible land uses east of U.S. 101 include industrial, warehousing, hotels, and office/research & development. The Airport cautions against the Proposed Project's departure from this successful practice.

AIRPORT COMMISSION CITY AND COUNTY OF SAN FRANCISCO

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Billy Gross, City of South San Francisco
August 9, 2022
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The Comprehensive Airport Land Use Compatibility Plan for the Environs of San Francisco International Airport (SFO ALUCP) policies for noise are to protect the comfort and quality of life of the City's residents, and SFO discourages residential uses within the Airport's 65 dB or higher contours. The Draft Program EIR identifies in Impact HAZ-5 that the General Plan Policy SA-12.6 requires the City to encourage residential development in the South Spruce area that is within the 65 dB CNEL, provided that the structure meets the standard indoor 45 dB noise requirement. This impact statement does not acknowledge that the SFO ALUCP also requires the grant of an aviation easement to the City and County of San Francisco, as the proprietor of SFO, as a condition of allowing residential development within the 65 dB CNEL contour.¹ At a minimum, the requirement for granting an aviation easement should be included in Impact HAZ-5 in determining the level of significance. Impact LUP-2 also acknowledges that portions of the proposed mixed-use residential land use designations are located within the 65 dB CNEL and does state the requirement for granting an aviation easement but does not mention the requirement to reduce the indoor noise level to 45 dB. Also, while aviation easements are an important liability mitigation tool, they do not replace the imperative to avoid introducing incompatible uses into a noise-affected area. As shown in ALUCP Table IV-1, residential uses are not compatible within the 70 dB contour and higher, and the Draft Program EIR should evaluate them as such.

Further, many Airport departure procedures are designed to ascend over either the San Bruno Gap or Oyster Point, including one procedure, the Shoreline Departure visual procedure, which is a noise abatement procedure designed specifically to keep aircraft over the industrial areas of the City east of U.S. 101 and away from its traditional residential areas. Any residential developments east of U.S. 101, such as those proposed in the General Plan Update, could reduce the efficacy of the Nighttime Preferential Runway Use program developed in 1988 and put in place specifically to protect residents of South San Francisco, Daly City, and Pacifica by maximizing flights over water and industrial areas between 1:00 a.m. and 6:00 a.m. Any residential uses allowed in areas east of U.S. 101 would experience noise disturbances from aircraft departures. We expressed concern about this in our March 22, 2021 comment letter. The Draft Program EIR has not specifically analyzed these potential environmental impacts of the Proposed Project. The Airport also urges the City to engage the SFO Airport/Community Roundtable as soon as possible to notify the public and stakeholders about the project as it relates to the existing and long-established aircraft noise abatement procedures to the City and adjacent cities.

Also, in Impact NOI-3, the Draft Program EIR states "These airport activity noise levels could exceed the City's noise/land use compatibility standards for certain land uses." This language implies that the Airport is actively exceeding noise and land use compatibility standards. This language is misleading and should be corrected; rather, the General Plan Update would allow for mixed-use residential uses within the already established 65 dBA CNEL. Also, within this impact statement, an incorrect reference to Mitigation Measure (MM) NOI-2 is made; there is no MM NOI-2. Rather, it should be MM NOI-3, which properly corresponds to the number of the impact statement.

¹ SFO ALUCP Noise Policy-3.

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If the City were to propose a development which the ALUC determines is incompatible with the SFO ALUCP, then the City would be compelled to override the ALUC determination through its City Council if it wishes to proceed with the development. An override of the noise compatibility policy requires granting of an aviation easement to the City and County of San Francisco, as proprietor of SFO.

2. SAFETY COMPATIBILITY

With respect to safety, Impact LUP-2 identifies that the southern portions of the General Plan Update area are within various runway end safety zones, including the Inner Approach/Departure Zone (Zone 2), Inner Turning Zone (Zone 3), and Outer Approach/Departure Zone (Zone 4) and has the potential to conflict with respective zone restrictions. We expressed concern about this in our March 22, 2021 comment letter. Each of these zones carries restrictions on what may be located there, based on the safety compatibility criteria and guidelines in the ALUCP, which in turn were adapted from the California Airport Land Use Planning Handbook. The Handbook's risk-based guidance is informed by a rigorous analysis of historical aircraft incident data. The ALUCP already recognizes the intense level of existing development in the vicinity of SFO and makes compromises compared to the Handbook's recommendations, and the Airport recommends against further degradation of these safety restrictions.

The Draft Program EIR concludes, however, under Impact LUP-2 that the Proposed Project would not cause a significant environmental impact. It is not clear how the Draft Program EIR comes to this conclusion as there are clear potential conflicts with safety compatibility policies as acknowledged in Impact LUP-2. The purpose of the safety compatibility policies is twofold: 1) to protect the public health, safety, and welfare by minimizing the public's exposure to the risk associated with potential aircraft accidents in the Airport vicinity and 2) to protect the public interest in providing for the orderly development of SFO by preventing the creation of new safety problems in Airport environs. The overall objective is to minimize risks associated with potential aircraft accidents to persons on the ground and aircraft occupants.

3. AIRSPACE COMPATIBILITY

Impact HAZ-5 describes how the City would consult with the City/County Association of Governments (C/CAG) and the Federal Aviation Administration (FAA) when new development is proposed in the vicinity of SFO. This language is potentially misleading as the City is not required to "consult" with but rather, it is required to submit to the C/CAG (or specifically, the Airport Land Use Commission within C/CAG) for a determination of consistency with the SFO ALUCP.

As it pertains to height compatibility, any proposed structure must lie wholly beneath the critical aeronautical surfaces defined in the SFO ALUCP and must obtain a Determination of No Hazard from the FAA. These processes are parallel, as the SFO ALUCP and the FAA study different airspace surfaces when coming to their determinations. Given the degree of confusion that the City and the Airport have observed on this process over the past several years, the Airport suggests clarifying language that acknowledges these two parallel determination processes. Further, the

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Airport recommends clarifying that for purposes of airspace evaluation, both the FAA and the SFO ALUCP reference elevations above mean sea level (MSL) as defined by the 0-foot origin of the North American Vertical Datum of 1988 (NAVD88), and not the ground level.

* * *

The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to the General Plan update, Program EIR, or any future projects, please do not hesitate to contact me at (650) 821-6678 or at nupur.sinha@flysf.com.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

Nupur Sinha
Director of Planning and Environmental Affairs
San Francisco International Airport
P.O. Box 8097
San Francisco, California 94128

Attachment

cc: Susy Kalkin, ALUC
Sean Charpentier, C/CAG
Sam Hindi, Chairperson, SFO Airport/Community Roundtable
Audrey Park, SFO

ATTACHMENT

Comment Letter from SFO to City of South San Francisco re: Notice of Preparation of a Program
Environmental Impact Report for Proposed South San Francisco General Plan Update (March 22, 2021)



San Francisco International Airport

March 22, 2021

Billy Gross
Senior Planner
City of South San Francisco
Planning Division
315 Maple Ave.
South San Francisco, CA 94080

TRANSMITTED VIA EMAIL
billy.gross@ssf.net

Subject: Notice of Preparation of a Program Environmental Impact Report for Proposed South San Francisco General Plan Update

Dear Mr. Gross,

Thank you for notifying San Francisco International Airport (SFO or the Airport) regarding the preparation of a Program Environmental Impact Report (Program EIR) for the proposed South San Francisco General Plan Update (the project). We appreciate this opportunity to coordinate with the City of South San Francisco (the City) in considering and evaluating potential land use compatibility issues that the project may pose and should address.

As described in the Notice of Preparation (NOP), the project site is the geographic limits of the City, in San Mateo County. The southeastern portion of the project borders, and in certain areas overlaps with, City and County of San Francisco/SFO property boundaries. The City is primarily residential, with this use occupying approximately 40% of its land area, followed by industrial/research and development (RD) at approximately 30%, and parks/open space/common greens at approximately 10%. The NOP notes that presently there are about 150 acres of vacant land remaining in the City, which amounts to 3.4% of the City. This project will serve as a blueprint for the City's vision through the year 2040 and will replace the 1999 General Plan and inform updates to the City's Zoning Ordinance.

The City's proposed changes are highlighted in Proposed Land Use Maps and, specifically, the Land Use Map depicting the changes from the existing map (see Figure 1). This map highlights the concentration in change along the U.S. Highway 101 (U.S. 101) corridor, the "East of 101" precinct including Oyster Point, and transit nodes such as the San Bruno Bay Area Rapid Transit (BART) and South San Francisco BART and Caltrain stations, which have been targeted for zoning intensification. The NOP notes that the project permits approximately 14,324 net new housing units and approximately 13,352 net new employment opportunities by 2040. This map highlights that much of this change will come from intensifying land uses which were previously exclusively office/RD or industrial under the 1999 General Plan to include mixed use or high-density mixed use, which would allow for residential uses.

The Airport is concerned that much of the land slated for this change is closer to the Airport than the previous General Plan's housing element, and portions of the proposed mixed-use residential zones are within the Airport's runway safety zone boundaries and 65 decibel (dB) Community Noise Equivalent Level (CNEL) noise contour. In the 1999 General Plan, the City acknowledged the significance of and retained areas east of U.S. 101 for cargo handling and freight forwarder uses that support the cargo operations at SFO. The Airport appreciates that in the intervening years, the City has successfully maintained these land uses east of U.S. 101, which enhance and support the relationship among the City, its residents, and the Airport. These existing compatible land uses east of U.S. 101 include industrial, warehousing, hotels, and office/RD. The Airport cautions against the project's proposed departure from this successful practice.

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Mr. Billy Gross
 March 22, 2021
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The close proximity of these areas to SFO would require developments to undergo federal, state, and local regulatory review processes specific to airport noise, airspace safety, and other land use compatibility standards, including 14 Code of Federal Regulations Part 77 regulations for the safety, efficient use, and preservation of navigable airspaces. Airport staff encourages the City to work closely with the Airport Land Use Commission (ALUC)¹ to determine project consistency with the Comprehensive Airport Land Use Compatibility Plan for the Environs of SFO (ALUCP)² and other regulatory review procedures. The Program EIR should evaluate the project for consistency with all ALUCP regulatory requirements and policies.

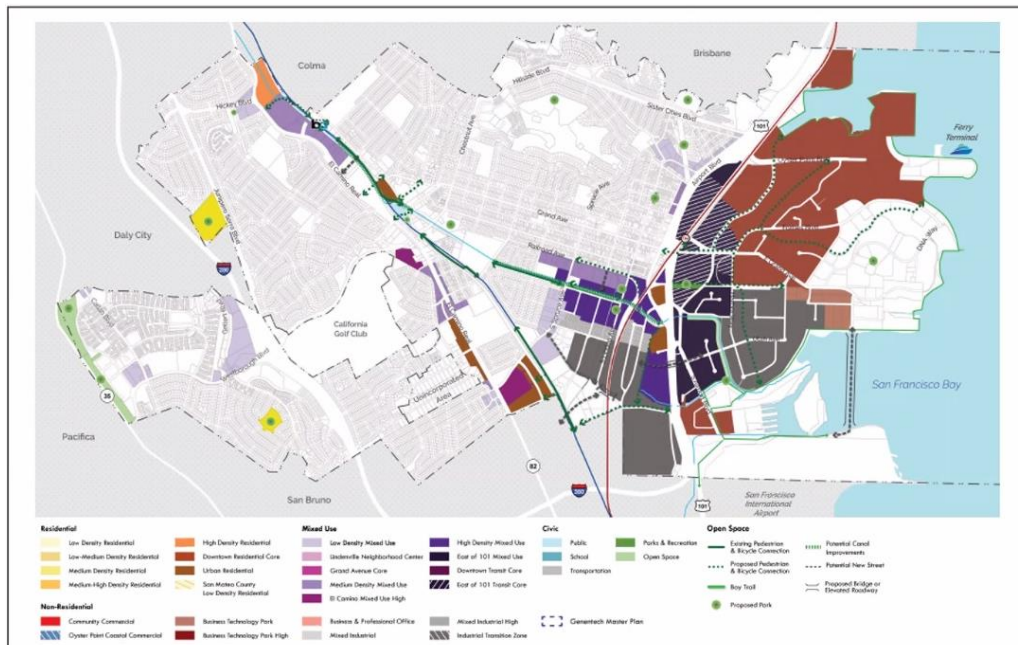


Figure 1: Proposed Changes from Existing Land Use Map (NOP of Program EIR Exhibit 5)

The ALUCP establishes policies, to ensure compatibility between the Airport and surrounding land uses and to protect local residents and workers from adverse effects of airport operations. All three topics are based on research into actual effects of airport operations on human health and safety.³

- **Noise:** Reduce the potential number of future residents who could be exposed to noise effects from airport and aircraft operations.
- **Safety:** Minimize the potential number of future residents and land use occupants exposed to hazards related to aircraft operations and/or catastrophic incidents.
- **Elevation/Height:** Protect the navigable airspace around the Airport for the safe and efficient operation of aircraft in flight.

¹ State law requires an ALUC for every county with an airport in its jurisdiction. *See* Cal. Pub. Util. Code §§ 21670-21679.5. In San Mateo County, the City/County Association of Governments of San Mateo County (C/CAG) board serves as the ALUC.

² State law requires the preparation of an ALUCP. *See id.* In 2012, C/CAG, in consultation with the Airport and surrounding communities, adopted the current ALUCP, which addresses issues related to compatibility between airport operations and surrounding proposed land use development, considering noise impacts, safety of persons on the ground and in flight, height restrictions/airspace protection, and overflight notification.

³ California Department of Transportation (Caltrans) Division of Aeronautics, California Airport Land Use Planning Handbook, October 2011.

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Most of the City, and all of the areas of proposed land use intensification around and to the east of U.S. 101, are located within the ALUCP Airport Influence Areas A and B (see Figure 2). The ALUCP requires all residential development within Area A, which is the entirety of San Mateo County, to provide real estate disclosures, a copy of which can be found at ALUCP Appendix G-7. Additionally, within the more restrictive Area B, “the ALUC [the C/CAG Board] shall exercise its statutory duties to review proposed land use policy actions, including new general plans, specific plans, zoning ordinances, plan amendments and rezoning, and land development proposals.”⁴ The City must accordingly submit the proposed general plan update to the ALUC for review.

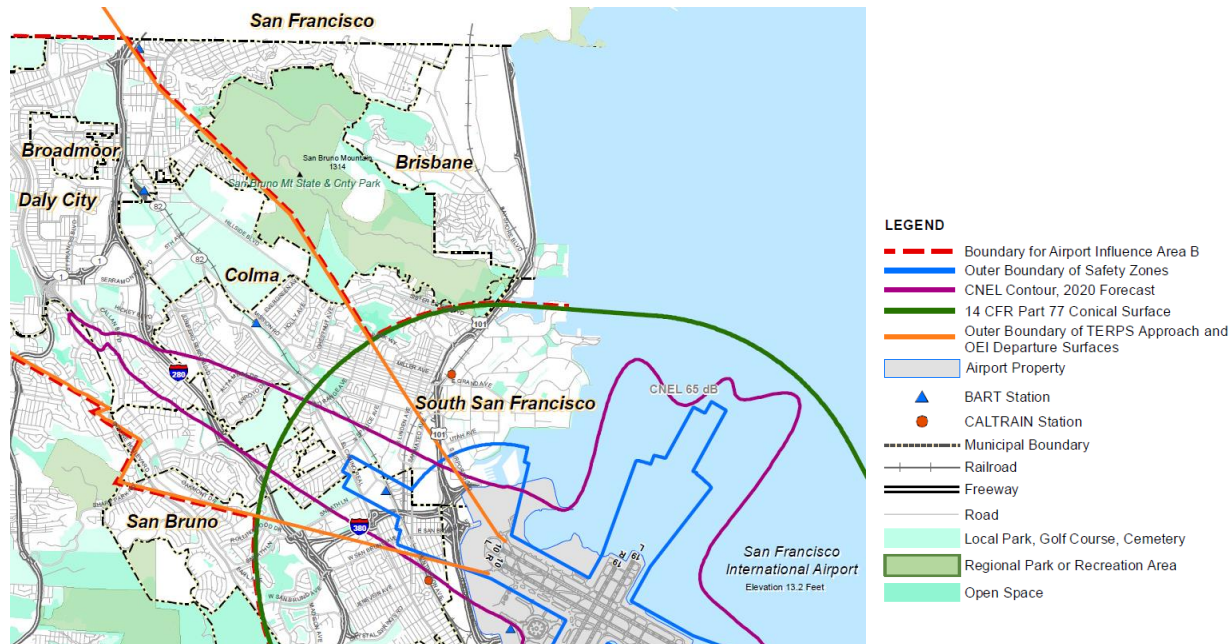


Figure 2: ALUCP-defined boundaries affecting South San Francisco (ALUCP Exhibit IV-3)

With respect to noise compatibility, portions of the project are situated within the Airport’s 65 dB CNEL noise contour, and some even within the 70 dB contour. The ALUCP policies for noise are to protect the comfort and quality of life of the City’s residents, and SFO discourages residential uses within the Airport’s 65 dB or higher contours. To the extent that the project would allow such uses, the Program EIR must disclose and evaluate any inconsistency with the ALUCP. The ALUCP requires the grant of an aviation easement to the City and County of San Francisco, as the proprietor of SFO, as a condition of allowing residential development within the 65 dB contour.⁵ While aviation easements are an important mitigation tool, they do not replace the imperative to avoid introducing incompatible uses into a noise-affected area in the first place. As shown in ALUCP Table IV-1, residential uses are not compatible within the 70 dB contour and higher, and the Program EIR should evaluate them as such.

Further, many Airport departure procedures are designed to ascend over either the San Bruno Gap or Oyster Point, including one procedure, the Shoreline Departure visual procedure, which is a noise abatement procedure designed specifically to keep aircraft over the industrial areas of the City east of U.S. 101 and away from its traditional residential areas. Any residential developments east of U.S. 101 could reduce the efficacy of the Nighttime Preferential Runway Use program developed in 1988 and put in place specifically to protect residents of South San Francisco, Daly City, and Pacifica by maximizing flights over water and industrial areas between

⁴ ALUCP IP-2 (Airport Influence Area B – Policy/Project Referral Area), p. IV-11.

⁵ ALUCP NP-3.

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 March 22, 2021
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1:00 a.m. and 6:00 a.m. Any residential uses allowed in areas east of U.S. 101 would experience noise disturbances from aircraft departures. The Program EIR should evaluate these potential environmental impacts of the project. The Airport also urges the City to engage the SFO Airport/Community Roundtable as soon as possible to notify the public and stakeholders about the project as it relates to the existing and long-established aircraft noise abatement procedures to the City and adjacent cities.

Any proposed residential uses outside of the 65 dB contour should still meet the interior noise requirements of the California Building Code. Noise impacts on sensitive receptors and any necessary mitigation measures should be fully evaluated in the Program EIR, and the EIR should describe the project's consistency with noise policies described in ALUCP, including noise policies NP-1 through NP-4.

The Airport understands and supports the City's efforts to address the region's housing supply shortage with its General Plan update. SFO has felt the effects of the housing crisis firsthand, with many people who work at the Airport forced to finding housing 60 miles away, or farther. This places a considerable hardship on the employees, Airport, neighboring communities, and the regional surface transportation system, and we would welcome affordable, transit-oriented housing closer to the Airport. However, subjecting new residents to excessive aircraft noise is not an equitable solution. SFO requests that the City revise its proposals for residential and mixed uses away from the 65 dB CNEL contour, including the southern portions of Highway 101 and San Bruno BART station. Any upzoning proposed along the City's commercial core along Grand Avenue or higher density around South San Francisco BART station would be outside of the critical 65 dB CNEL contour and would not pose these concerns.

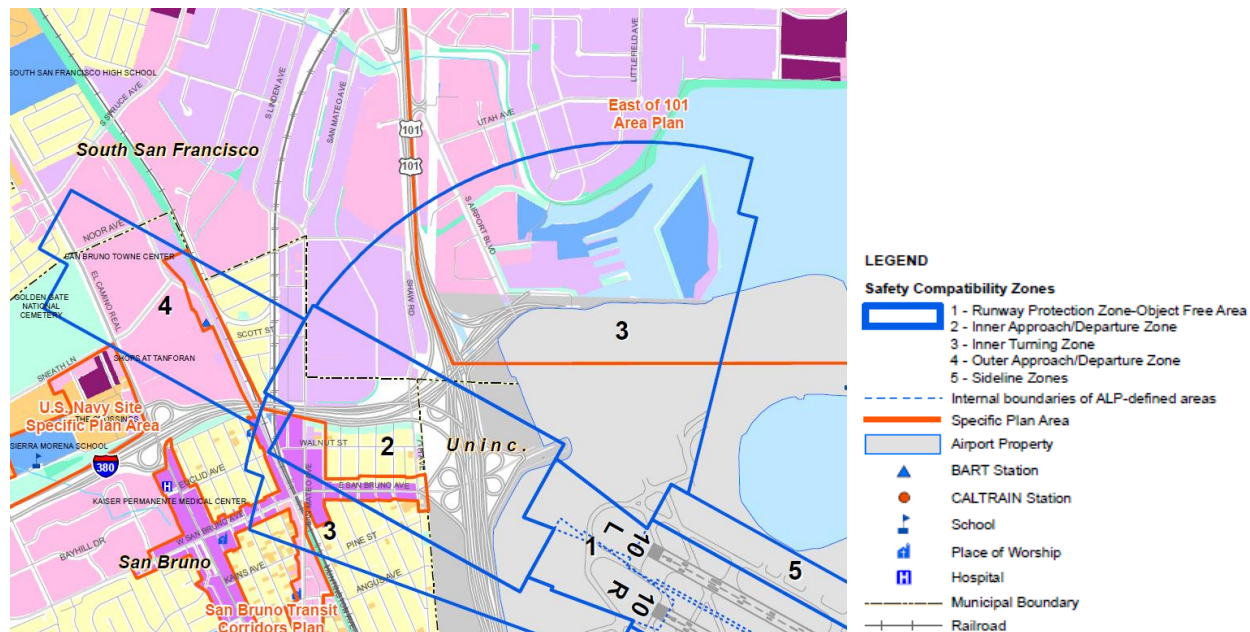


Figure 3: SFO runway safety compatibility zones around South San Francisco (ALUCP Exhibit IV-8)

With respect to safety, the southern portions of the General Plan area are within various runway end safety zones, including the Inner Approach/Departure Zone, Inner Turning Zone, and Outer Approach/Departure Zone (see Figure 3). Each of these zones carry restrictions on what may be located there, based on the safety compatibility criteria and guidelines from the California Airport Land Use Planning Handbook. The Handbook's risk-based guidance is informed by a rigorous analysis of historical aircraft incident data. The ALUCP already recognizes the intense level of existing development in the vicinity of SFO, and the Airport recommends against overriding these

Mr. Billy Gross
March 22, 2021
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restrictions. The Program EIR should also describe and evaluate the project's consistency with land use criteria within these runway end safety zones, as described in ALUCP SP-1 through SP-3.

With respect to elevation, the Airport appreciates the City's commitment to protecting the critical airspace surfaces defined in the ALUCP, as these surfaces protect the safety and economic vitality of the Airport and the City. The Airport has observed several points of confusion regarding airspace surfaces and requests that the City work with SFO staff to ensure the accuracy of the guidance provided in the General Plan Update.

For example, all critical airspace surfaces are based on elevation above mean sea level (AMSL) – not height above ground level (AGL). Therefore, if the General Plan Update establishes height restrictions, it should note them in AMSL rather than AGL and incorporate by reference the most recently adopted version of the ALUCP. It should also note that the finished height of any proposed development must be maintained below these clearance limits, including architectural parapets, machine rooms, antennas, etc. The Airport suggests that any exhibits included in the General Plan Update should include prominent notes which address these common concerns.

Finally, the General Plan Update also proposes a new vehicular bridge between Oyster Point, likely around the southern end of Haskins Way, and North Access Road on Airport property. While we understand this may be highly notional, if the City does intend to pursue the concept, the Program EIR should fully evaluate it. We also request that the City keep the Airport apprised of any developments regarding this proposal, which would require close coordination with the Airport. For example, the Airport would need to understand vehicular movements and how the bridge could increase or redistribute traffic on the Airport's roadways and intersection with Interstate 380 in deciding whether to support the project.

The Airport appreciates your consideration of these comments. If I can be of assistance as the City considers airport land use compatibility as they relate to the General Plan update, Program EIR, or any future projects, please do not hesitate to contact me at (650) 821-9464 or at nupur.sinha@flysfo.com.

Sincerely,

DocuSigned by:
Nupur Sinha
7D552AE6A4CE495...

Nupur Sinha
Acting Planning Director
Planning and Environmental Affairs

cc: Susy Kalkin, Airport Land Use Committee
Sandy Wong, C/CAG
Audrey Park, SFO, Acting Environmental Affairs Manager